

# **EXHIBIT A**

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**From:** [Kaiser, Steven J.](#)  
**To:** [Robert Falanga](#)  
**Cc:** [Riccio, Nicole](#); [Garrison, Grady](#); [pcoggins@lockelord.com](#); [bgaffney@lockelord.com](#); [Kobelah Bennah](#); [Haynes, Savannah](#)  
**Subject:** RE: Deposition dates  
**Date:** Friday, April 8, 2022 9:41:19 AM  
**Attachments:** [image001.png](#)

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Robert,

All Defendants could do the following schedule:

Hallmark or Weber on May 9

Other of Hallmark or Weber on May 11

Defendants accept the 10<sup>th</sup> for Haygood and 17<sup>th</sup> for Owens.

We will also be issuing 30(b)(6) notices, which we hope can be accomplished the same days for the respective organizations.

Let us know about the 9<sup>th</sup> and 11<sup>th</sup> for Hallmark and Weber.

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**From:** Robert Falanga <[Robert@FalangaLaw.com](mailto:Robert@FalangaLaw.com)>  
**Sent:** Friday, April 1, 2022 6:19 PM  
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**Subject:** Deposition dates

Steven:

I have gotten with my clients and I have the following deposition dates for you. You said that we need to get these done during the first three weeks of May so I have scheduled the following:

Ashley Haygood-May 10<sup>th</sup>

Craig Hallmark-May 12<sup>th</sup>

Heidi Weber- May 13th

David Owens-May 17<sup>th</sup>

My schedule for those first three weeks of May are a nightmare so these are the best that I could do within the three week period that you asked for these to be scheduled.

On another note, we have received additional documents from Mr. Owens and are going through those now with the RICOH people. We hope to get those to you the first part of next week.

Thanks

*Robert Falanga*



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